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October 10, 2024

**VIA ECF**

Honorable Judge Ronnie Abrams  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Case 1:24-cv-03773-RA – *Tarr v. Parfum Francis Kurkdjian, LLC*  
Motion for Extension of Time to Reopen Action

Dear Judge Abrams:

The Plaintiff's counsel, with the consent of Defendant's counsel, respectfully files this motion requesting an extension of time to reopen the action, which motion to restore the action should be filed by October 10, 2024 pursuant to the Court's order dated September 10, 2024.

While the parties have entered into a settlement, certain terms of the settlement have yet to be executed including finalizing the terms of the settlement agreement, and so Plaintiff needs additional time before Plaintiff can agree to dismiss the action and/or to reopen the action, should it be necessary. As such, Plaintiff additionally requests an additional 45-day extension to file an application to reopen the action, from October 10, 2024 to November 25, 2024. This is the first time this relief is being requested and upon the consent of the Defendant's counsel. We thank Your Honor for the attention and consideration herein.

Respectfully submitted,

/s/ Mars Khaimov  
Attorney for Plaintiff

Cc: all Counsel of record on ECF

Application granted.

SO ORDERED.

A blue ink signature of Hon. Ronnie Abrams, consisting of stylized initials and a surname.

Hon. Ronnie Abrams  
October 11, 2024

